



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

February 25, 2022

MEMO ENDORSED

By ECF

Honorable Valerie E. Caproni
United States District Judge
Southern District of New York
40 Foley Square
New York, NY 10007

USDC SDNY
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Re: *United States v. Victor Miguel Hernandez Ramirez*, 21 Cr. 578 (VEC)

Dear Judge Caproni:

The Government writes respectfully to request that, in order to permit the parties additional time to discuss a potential pretrial resolution of this case, the Court adjourn the conference in the above-captioned matter currently scheduled for February 28, 2022, for approximately thirty (30) days.

The Government further requests that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), between February 28 and the newly-scheduled conference, in order to allow additional time for the parties' discussions. Defense counsel consents both to the request for an adjournment and to the exclusion of time.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney
Southern District of New York

By: /s/
Jarrod L. Schaeffer
Assistant United States Attorney
Tel: (212) 637-2270

cc: Counsel of Record (via ECF)

Application GRANTED in part. The status conference scheduled for February 28, 2022 is CANCELED.

The Court will request an in-person trial date early in the third quarter of 2022 (July-August 2022), subject to availability and the status of the COVID-19 pandemic. Defendant's pretrial motions, if any, are due by **April 1, 2022**. The Government's opposition is due by **April 22, 2022**, and Defendant's reply is due by **May 6, 2022**.

All motions *in limine* are due by **May 15, 2022**. Responses are due by **May 27, 2022**. The Court will set a schedule for requests to charge and proposed voir dire questions closer to trial.

Time is excluded for the period between now and June 30, 2022, under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7) (A), as the ends of justice served by giving Defendant additional time, given the logistical difficulties that are continuing to be caused by COVID-19, outweigh the interests of the public and the Defendant in a speedy trial.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni", is written over a horizontal line.

2/25/2022

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE